

REMARKS

By this amendment, claims 5, 6, 12, 14-16, 18-20, 58, 61-63, and 86-92 are pending in the application, of which claims 15 and 91 are being amended under Rule 312, and claims 1-4, 7-11, 13, 17, 21-57, 59, 60, and 64-85 are being cancelled. The claim amendments add no new matter, and their entry is respectfully requested:

Claim 15 is being amended to replace the number "14" with the number "1".

Claim 91 is being amended to add the word "support" before the word "structure".

The amendments are for the purposes of clarification and/or to cosmetically improve the claim language. These changes do not affect the scope of the claims; thus, the scope of the doctrine of equivalents applied to these claims should not be limited under the rules of *Festo Corp. v. Shoketsu Kinzoku Kogyo Kabushiki Co.*, 535 U.S. 722, 2002 Lexis 3818 (May 28, 2002).

COMMENTS ON STATEMENT OF REASONS FOR ALLOWANCE

Applicant thanks the Examiner for indicating allowance of all the pending claims, namely claims 5, 6, 12, 14-16, 18-20, 58, 61-63, and 86-92.

The Examiner provided the following reasons for allowance:

"The prior art of record fails to teach or fairly suggest: A substrate support comprising: a) a ceramic support having an electrode embedded therein, the electrode being chargeable to electrostatically hold a substrate; and b) a contact surface comprising a plurality of mesas, each mesa composed of (i) a surface coating comprising a diamond-like carbon material having a composition of from about 50 atom % to about 90 atom % carbon, from about 5 atom % 50 [sic] about 10 atom% hydrogen, from about 10 atom % to about 20 atom % silicon, and from about 5 atom % to about 10 atom % oxygen, the surface coating comprising a coefficient of friction of less than about 0.3, an average surface roughness of less than about 0.4 micrometers, and a microhardness of at least about 8 GPa (*emphasis added*); and (ii) an adhesion layer comprising a metal layer between the ceramic support structure and the surface coating. Further, no other prior art was located that fairly suggested the claimed invention in whole or in part, along with the requisite motivation for combination, to anticipate or render the claimed invention obvious."

However, the allowed claims contain several independent claims, each of which has independently distinguishable features which render the claim patentable over the cited art.

For example, claim 12 recites:

12. A substrate support comprising:

- (a) a ceramic structure having an electrode embedded therein, the electrode being chargeable to electrostatically hold a substrate; and
- (b) a contact surface comprising a plurality of mesas, the mesas

comprising a coating of a diamond-like carbon material directly over a titanium metal adhesion layer, the diamond-like carbon material comprising a composition of from about 50 atom % to about 90 atom % carbon, from about 5 atom % to about 10 atom% hydrogen, from about 10 atom % to about 20 atom % silicon, and from about 5 atom % to about 10 atom % oxygen, to provide a coefficient of friction of less than about 0.3, an average surface roughness of less than about 0.4 micrometers, and a microhardness of at least about 8 GPa, whereby the diamond-like coating reduces the abrasion and contamination of substrates that contact the coating.

Similarly, claim 86 recites:

86. A substrate support comprising:

- (a) a ceramic support structure having an electrode embedded therein, the electrode being chargeable to electrostatically hold a substrate; and
- (b) a contact surface comprising a plurality of mesas, each mesa comprising:
 - (i) a titanium layer; and
 - (ii) a diamond-like carbon coating layer over the titanium layer, the diamond-like carbon coating layer comprising (i) a composition of from about 50 atom % to about 90 atom % carbon, from about 5 atom % to about 10 atom% hydrogen, from about 10 atom % to about 20 atom % silicon, and from about 5 atom % to about 10 atom % oxygen, (ii) a coefficient of friction of less than about 0.3, (iii) an average surface roughness of less than about 0.4 micrometers, and (iv) a microhardness of at least about 8 GPa.

Thus, each of the independent claims provided in the present application is independently novel and non-obvious over the cited references. Accordingly, the language the Examiner uses in her reasons for allowance should not be used to limit the scope of the other independent claims in the subject application as each independent claim recites a distinctly patentable element or combination of elements.

The Examiner is requested to accept these Comments on Statement of Reasons for Allowance to explain the allowability of each independent claim in the present set of claims.

Should the Examiner disagree with the above remarks or have questions regarding the same, the Examiner is respectfully requested to telephone Applicant's representative at the number listed below.

Respectfully submitted,

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